

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	CRIMINAL NO. 4:22-CR-612
	§	
PERRY “PJ” MATLOCK	§	

MOTION FOR RETURN OF PROPERTY AND RELEASE OF BOND

TO THE HONORABLE JUDGE ANDREW S. HANEN:

COMES NOW, Perry Matlock by and through his attorney and requests this Court to order the return of Mr. Matlock’s United States Passport and release of his appearance bond. For good cause, Mr. Matlock would show the Court as follows:

I.

On March 20, 2024, this Court granted a Second Joint Motion to Dismiss to Superseding Indictment acknowledging that the “Indictment is defective for failing to state an offense and much be dismissed without prejudice...”¹

II.

Mr. Matlock’s United States Passport was collected upon his release on bond and is currently being held in the custody of the United States Pretrial Services Office. Now that Mr. Matlock’s case has been dismissed, he requests the return

¹ See ECF No. 628.

of his passport and all other property, including but not limited to, his cellular telephone, held by the United States.

III.

Additionally, Mr. Matlock paid a secured bond in the amount of \$500,000 on December 14, 2024.² Now that Mr. Matlock's case has been dismissed, he requests the security be released.

WHEREFORE PREMISES CONSIDERED, Mr. Matlock respectfully request this Court order Pretrial Services to return his United States passport and that his appearance bond of \$500,000 be released.

Respectfully Submitted,

/s/ Alexander Brown
Alexander E. Brown
TX Bar #: 24099270
919 Congress Ave.
Suite 1325
Austin, Texas 78701
Telephone: (512) 370-1800
abrown@ashcroftlawfirm.com

² See ECF No. 45.

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of March 2024, a true and correct copy of the foregoing Motion was delivered to the Government via email.

/s/Alexander Brown

ALEXANDER BROWN